

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

EDWARD H. KUBO, JR. #2499  
United States Attorney  
District of Hawaii

FLORENCE T. NAKAKUNI #2286  
Chief, Narcotics Section

*2 FEB 25 2004*  
at 2 o'clock and 20 min M  
WALTER A.Y.H. CHINN, CLERK

KENNETH M. SORENSEN  
Assistant U.S. Attorneys  
Room 6-100 PJKK, Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Facsimile: (808) 541-2958  
Ken.Sorenson@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO.	<i>CR 04-00089 DAE</i>
	)		
Plaintiff,	)		INDICTMENT
	)		
vs.	)		
	)		[21 U.S.C. §§ 846,
ROCKY DEMELLO	(01)	)	841(a)(1) & (b)(1)(B)
ERNIE SALDUA, JR.	(02)	)	and 18 U.S.C. §2]
LARRY CLIFFORD	(03)	)	
	)		
Defendants.	)		
	)		

INDICTMENT

COUNT 1

The Grand Jury charges:

On or about between February 5, 2004 and February 8, 2004, in the District of Hawaii and elsewhere, ROCKY DEMELLO and ERNIE SALDUA, JR., the defendants, did knowingly and intentionally conspire together and with other persons known and

unknown to the Grand Jury, to distribute and to possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

On or about February 11, 2004, in the District of Hawaii, ERNIE SALDUA, JR., the defendant, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, and LARRY CLIFFORD, did knowingly and unlawfully aid and abet in the commission of this offense.

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All in violation of Title 21, United States Code,  
Sections 841(a)(1), (b)(1)(A), and Title 18, United States Code,  
Section 2.

DATED: February 25, 2004, at Honolulu, Hawaii.

A TRUE BILL

*[Signature]*  
\_\_\_\_\_  
FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

*Florence Nakakuni*  
FLORENCE T. NAKAKUNI  
Chief, Narcotics Section

*Kenneth M. Sorenson*  
KENNETH M. SORENSEN  
Assistant U.S. Attorney